

Mark A. Berman, Esq.

**HARTMANN DOHERTY ROSA
BERMAN & BULBULIA LLP**

433 Hackensack Avenue, Suite 1002

Hackensack, New Jersey 07601

t: 201-441-9056

Counsel of Record for Defendants

Express Scripts, Inc. & Accredo Health Group, Inc.

JOHNSON & JOHNSON HEALTH
CARE SYSTEMS INC.,

Plaintiff,

v.

SAVE ON SP, LLC,
EXPRESS SCRIPTS, INC., and
ACCREDITO HEALTH GROUP, INC.,

Defendants.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Civil No. 22-2632 (JKS) (CLW)

NOTICE OF MOTION TO SEAL

ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on April 7, 2025, at a time and place to be set by the Court, Defendants Express Scripts, Inc. (“ESI”), Accredo Health Group, Inc. (“Accredo”), and Save On SP, LLC (“SaveOn”) will move before the Honorable Freda L. Wolfson, Special Master, for entry of an Order:

- (a) Permanently maintaining under seal Exhibits 11-20 filed by JJHCS in support of its the Motion to Compel Accredo Health Group and Express Scripts to Produce Documents Without Redaction dated

February 4, 2025, with related briefing dated February 13, 2025 and February 20, 2025 (ECF Nos. 507, 525, & 531), and redacting protected health information in Exhibit 1 Appendix A of ESI and Accredo's Opposition to JJHCS's Motion to Compel the Production of Documents Without Redaction;

- (b) Permitting Accredo and ESI to file the proposed public versions of the PHI Motion and related briefing (ECF Nos. 507, 525, 531) attached as Exhibit A to the Declaration of Mark A. Berman submitted in support of this motion ("Berman Declaration").

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Accredo and ESI will rely on the accompanying Berman Declaration and the indices in support of this motion. SaveOn will rely on the accompanying Wohlforth Declaration and index in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that no brief is necessary under Local Civil Rule 7.1(d)(4) because the application presents issues that are familiar to the Court.

PLEASE TAKE FURTHER NOTICE that JJHCS does not object to the relief requested.

Dated: March 6, 2025

/s/ Mark A. Berman

Mark A. Berman
HARTMANN DOHERTY ROSA
BERMAN & BULBULIA LLP
433 Hackensack Avenue, Suite 1002
Hackensack, NJ 07601
(201) 441-9056
mberman@hdrbb.com

*Counsel of Record for Defendants Accredo
Health Group, Inc. and Express Scripts, Inc.*

Jeremy M. Sternberg (*pro hac vice*)
Andrew Solinger (*pro hac vice*)
Emily A. Robey-Phillips (*pro hac vice*)
Holland & Knight LLP
10 St. James Avenue, 11th Floor
Boston, MA 02116
(617) 523-6850
Jeremy.sternberg@hklaw.com
Andrew.solinger@hklaw.com
Emily.robey-phillips@hklaw.com

*Counsel for Defendant
Accredo Health Group, Inc.*

Sarah C. Hellmann (*pro hac vice*)
Christopher A. Smith (*pro hac vice*)
Kate Ledden (*pro hac vice*)
Husch Blackwell LLP
8001 Forsyth Blvd., Suite 1500
St. Louis, Missouri 63105
(314) 480-1500

Fax: (314) 480-1505
sarah.hellmann@huschblackwell.com
chris.smith@huschblackwell.com
kate.ledden@huschblackwell.com

Counsel for Defendant Express Scripts, Inc.

By: E. Evans Wohlforth, Jr.
E. EVANS WOHLFORTH, JR.
ROBINSON & COLE LLP
666 Third Avenue, 20th Floor
New York, NY 10017-4132
Main (212) 451-2900
Fax (212) 451-2999
ewohlforth@rc.com

Philippe Z. Selendy (admitted *pro hac vice*)
Andrew R. Dunlap (admitted *pro hac vice*)
Meredith Nelson (admitted *pro hac vice*)
Elizabeth H. Snow (admitted *pro hac vice*)
SELENDY GAY PLLC
1290 Avenue of the Americas
New York, NY 10104
(212) 390-9000
pselendy@selendygay.com
adunlap@selendygay.com
mnelson@selendygay.com
esnow@selendygay.com

Attorneys for Defendant Save On SP, LLC